

# EXHIBIT F

1 UNITED STATES DISTRICT COURT  
2 FOR THE  
3 NORTHERN DISTRICT OF GEORGIA - ATLANTA DIVISION  
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6 IN RE: EQUIFAX, INC., MDL Docket No. 2800  
7 CUSTOMER DATA SECURITY BREACH  
8 LITIGATION No. 1:17-md-02800-TWT  
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14 PROCEEDINGS IN LIEU OF  
15 DEPOSITION OF REUBEN METCALFE  
16

17 Stenographically Reported by  
18 ANGELA SINCLAIR, CCRR, CRR, RPR, CSR No. 13902  
19 December 13, 2019  
20  
21

22 Aiken Welch Court Reporters  
23 One Kaiser Plaza, Suite 250  
24 Oakland, California 94612  
25 (510) 451-1580/(877) 451-1580  
Fax: (510) 451-3797  
www.aikenwelch.com

I N D E X

PAGE

STATEMENT ON THE RECORD BY MR. BERGER

4

E X H I B I T S

(No exhibits marked.)

Page 2

DEPOSITION OF REUBEN METCALFE

BE IT REMEMBERED, that pursuant to Subpoena, and on the 13th day of December 2019, commencing at the hour of 10:09 a.m., in the offices of Gibbs Law Group LLP, 505 14th Street, Suite 1110, Oakland, California, before me, ANGELA SINCLAIR, a Certified Shorthand Reporter, the following proceedings took place.

---o0o---

APPEARANCES:

For the Consumer Plaintiffs:

DAVID BERGER  
GIBBS LAW GROUP LLP  
505 14th Street, Suite 1110  
Oakland, California 94612  
(510) 350-9713  
dmb@classlawgroup.com

For the Defendant EQUIFAX:

ROBERT GRIEST (Via telephone)  
KING & SPALDING  
1180 Peachtree Street, NE, Suite 1600  
Atlanta, Georgia 30309  
(404) 572-4600  
rgriest@kslaw.com

Also Present:

Cassia Leet, Videographer

S T A T E M E N T O N T H E R E C O R D

--o0o--

MR. BERGER: This is David Berger, B-e-r-g-e-r, counsel for the consumer plaintiffs in the Equifax data breach litigation matter.

We are here in my offices in Oakland, California, to take the deposition of Class Action, Inc., a third party to this matter. I have received correspondence starting yesterday from an individual purporting to be counsel for Class Action, Inc., though he is not apparently licensed in any jurisdiction that would permit him to practice or defend this deposition.

He has informed me that Class Action, Inc., will not appear in violation of the subpoenas that we issued, that consumer plaintiffs issued and served upon Class Action, Inc., and the related agreements to give Class Action, Inc., several extensions to the time for this deposition.

It's now 10:10 and no one has appeared, and I have not heard back from counsel for Class Action, Inc., or putative counsel for Class Action, Inc., that they will appear this morning and will have to rely on their previous representations that the company will not appear at the deposition.

Counsel for Equifax is also here

1 telephonically. Do you want to state your appearance?

2 MR. GRIEST: Yes. This is Robert Griest,  
3 G-r-i-e-s-t, of King & Spalding representing the Equifax  
4 defendant in the Equifax MDL.

5 MR. BERGER: Because the witness is not here,  
6 we will hold the deposition open but will be unable to  
7 comply or unable to continue recording or asking  
8 questions today, or even to begin, and reserve all  
9 rights to seek further relief from the Court.

10 Is there anything else that you want to put on  
11 the record for Equifax, Robert?

12 MR. GRIEST: No. That's it for Equifax.

13 MR. BERGER: With that, we will conclude for  
14 today.

15 (The proceedings concluded at 10:12 a.m.)  
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REPORTER'S CERTIFICATE

I, ANGELA SINCLAIR, a Certified Shorthand Reporter in and for the State of California, do hereby certify:

That on December 13, 2019, I reported verbatim in shorthand writing the foregoing proceedings;

That I thereafter caused my shorthand writing to be reduced to typewriting, and that the foregoing transcript constitutes a full, true and correct transcription of all proceedings had.

Executed this 13th day of December 2019.

A handwritten signature in cursive script, appearing to read 'ASINCLAIR', is centered on the page.

ANGELA SINCLAIR, CCRR, CRR, RPR,  
CSR 13902  
State of California

## [&amp; - litigation]

<b>&amp;</b>	<b>9</b>	<b>comply</b> 5:7	<b>exhibits</b> 2:15
<b>&amp;</b> 3:19 5:3	<b>94612</b> 1:23 3:15	<b>conclude</b> 5:13	<b>extensions</b> 4:17
<b>0</b>	<b>a</b>	<b>concluded</b> 5:15	<b>f</b>
<b>02800</b> 1:6	<b>a.m.</b> 3:5 5:15	<b>constitutes</b> 6:10	<b>fax</b> 1:24
<b>1</b>	<b>action</b> 4:7,10,13 4:16,17,20,21	<b>consumer</b> 3:13 4:4 4:15	<b>following</b> 3:8
<b>10:09</b> 3:5	<b>agreements</b> 4:16	<b>continue</b> 5:7	<b>foregoing</b> 6:7,9
<b>10:10</b> 4:19	<b>aiken</b> 1:22	<b>correct</b> 6:10	<b>full</b> 6:10
<b>10:12</b> 5:15	<b>angela</b> 1:18 3:7 6:3,23	<b>correspondence</b> 4:9	<b>further</b> 5:9
<b>1110</b> 3:6,15	<b>apparently</b> 4:11	<b>counsel</b> 4:4,10,20 4:21,25	<b>g</b>
<b>1180</b> 3:19	<b>appear</b> 4:14,22,24	<b>court</b> 1:1,22 5:9	<b>g</b> 4:3 5:3
<b>13</b> 1:19 6:6	<b>appearance</b> 5:1	<b>crr</b> 1:18 6:23	<b>georgia</b> 1:3 3:20
<b>13902</b> 1:18 6:24	<b>appearances</b> 3:12	<b>csr</b> 1:18 6:24	<b>gibbs</b> 3:5,14
<b>13th</b> 3:4 6:12	<b>appeared</b> 4:19	<b>customer</b> 1:6	<b>give</b> 4:16
<b>14th</b> 3:6,15	<b>asking</b> 5:7	<b>d</b>	<b>griest</b> 3:18 5:2,2 5:12
<b>1600</b> 3:19	<b>atlanta</b> 1:3 3:20	<b>d</b> 2:1 4:1	<b>group</b> 3:5,14
<b>1:17</b> 1:6	<b>b</b>	<b>data</b> 1:6 4:4	<b>h</b>
<b>2</b>	<b>b</b> 2:7 4:3	<b>david</b> 3:14 4:3	<b>h</b> 2:7 4:1
<b>2019</b> 1:19 3:4 6:6 6:12	<b>back</b> 4:20	<b>day</b> 3:4 6:12	<b>heard</b> 4:20
<b>21358</b> 6:22	<b>berger</b> 2:3 3:14 4:3,3 5:5,13	<b>december</b> 1:19 3:4 6:6,12	<b>hold</b> 5:6
<b>250</b> 1:22	<b>breach</b> 1:6 4:5	<b>defend</b> 4:12	<b>hour</b> 3:5
<b>2800</b> 1:5	<b>c</b>	<b>defendant</b> 3:17 5:4	<b>i</b>
<b>3</b>	<b>c</b> 4:1	<b>deposition</b> 1:14 3:1 4:7,12,18,24 5:6	<b>individual</b> 4:9
<b>30309</b> 3:20	<b>california</b> 1:23 3:6 3:15 4:7 6:4,25	<b>district</b> 1:1,3	<b>informed</b> 4:13
<b>350-9713</b> 3:16	<b>cassia</b> 3:23	<b>division</b> 1:3	<b>issued</b> 4:15,15
<b>4</b>	<b>caused</b> 6:8	<b>dmb</b> 3:16	<b>j</b>
<b>4</b> 2:3	<b>crr</b> 1:18 6:23	<b>docket</b> 1:5	<b>jurisdiction</b> 4:11
<b>404</b> 3:20	<b>certificate</b> 6:1	<b>e</b>	<b>k</b>
<b>451-1580</b> 1:23,23	<b>certified</b> 3:7 6:3	<b>e</b> 2:1,7 4:1,1,1,1,3 4:3 5:3	<b>kaiser</b> 1:22
<b>451-3797</b> 1:24	<b>certify</b> 6:5	<b>equifax</b> 1:5 3:17 4:4,25 5:3,4,11,12	<b>king</b> 3:19 5:3
<b>5</b>	<b>class</b> 4:7,10,13,16 4:17,20,21	<b>executed</b> 6:12	<b>kslaw.com</b> 3:21
<b>505</b> 3:6,15	<b>classlawgroup.c...</b> 3:16		<b>l</b>
<b>510</b> 1:23,24 3:16	<b>commencing</b> 3:4		<b>law</b> 3:5,14
<b>572-4600</b> 3:20	<b>company</b> 4:23		<b>leet</b> 3:23
<b>8</b>			<b>licensed</b> 4:11
<b>877</b> 1:23			<b>lieu</b> 1:13
			<b>litigation</b> 1:6 4:5



[llp - yesterday]

<b>llp</b> 3:6,14	<b>q</b>	<b>states</b> 1:1	<b>y</b>  <b>yesterday</b> 4:9
<b>m</b>	<b>questions</b> 5:8	<b>stenographically</b> 1:17	
<b>m</b> 4:1 <b>marked</b> 2:15 <b>matter</b> 4:5,8 <b>md</b> 1:6 <b>mdl</b> 1:5 5:4 <b>metcalfe</b> 1:14 3:1 <b>morning</b> 4:22	<b>r</b> <b>r</b> 4:1,1,3,3 5:3 <b>received</b> 4:8 <b>record</b> 2:3 5:11 <b>recording</b> 5:7 <b>reduced</b> 6:9 <b>related</b> 4:16 <b>relief</b> 5:9 <b>rely</b> 4:22 <b>remembered</b> 3:3 <b>reported</b> 1:17 6:6 <b>reporter</b> 3:8 6:4 <b>reporter's</b> 6:1 <b>reporters</b> 1:22 <b>representations</b> 4:23 <b>representing</b> 5:3 <b>reserve</b> 5:8 <b>reuben</b> 1:14 3:1 <b>rgriest</b> 3:21 <b>rights</b> 5:9 <b>robert</b> 3:18 5:2,11 <b>rpr</b> 1:18 6:23	<b>street</b> 3:6,15,19 <b>subpoena</b> 3:3 <b>subpoenas</b> 4:14 <b>suite</b> 1:22 3:6,15 3:19	
<b>n</b>		<b>t</b>	
<b>n</b> 2:1 4:1,1 <b>ne</b> 3:19 <b>northern</b> 1:3		<b>t</b> 2:7 4:1,1,1,1 5:3 <b>take</b> 4:7 <b>telephone</b> 3:18 <b>telephonically</b> 5:1 <b>third</b> 4:8 <b>time</b> 4:17 <b>today</b> 5:8,14 <b>transcript</b> 6:10 <b>transcription</b> 6:11 <b>true</b> 6:10 <b>tw</b> 1:6 <b>typewriting</b> 6:9	
<b>o</b>		<b>u</b>	
<b>o</b> 4:1,1 <b>o0o</b> 3:10 4:2 <b>oakland</b> 1:23 3:6 3:15 4:6 <b>offices</b> 3:5 4:6 <b>open</b> 5:6		<b>unable</b> 5:6,7 <b>united</b> 1:1	
<b>p</b>		<b>v</b>	
<b>page</b> 2:2 <b>party</b> 4:8 <b>peachtree</b> 3:19 <b>permit</b> 4:12 <b>place</b> 3:8 <b>plaintiffs</b> 3:13 4:4 4:15 <b>plaza</b> 1:22 <b>practice</b> 4:12 <b>present</b> 3:22 <b>previous</b> 4:23 <b>proceedings</b> 1:13 3:8 5:15 6:7,11 <b>purporting</b> 4:10 <b>pursuant</b> 3:3 <b>put</b> 5:10 <b>putative</b> 4:21	<b>s</b> <b>s</b> 2:7 4:1 5:3 <b>security</b> 1:6 <b>seek</b> 5:9 <b>served</b> 4:15 <b>shorthand</b> 3:7 6:3 6:7,8 <b>signature</b> 6:22 <b>sinclair</b> 1:18 3:7 6:3,23 <b>spalding</b> 3:19 5:3 <b>starting</b> 4:9 <b>state</b> 5:1 6:4,25 <b>statement</b> 2:3	<b>verbatim</b> 6:6 <b>videographer</b> 3:23 <b>violation</b> 4:14	
		<b>w</b>	
		<b>want</b> 5:1,10 <b>welch</b> 1:22 <b>witness</b> 5:5 <b>writing</b> 6:7,8 <b>www.aikenwelc...</b> 1:24	
		<b>x</b>	
		<b>x</b> 2:1,7	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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